

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 07-CR-30068-JPG
)	
LOWELL THOMAS LAKIN,)	
a.k.a. Tom Lakin)	
)	
Defendant.)	

STIPULATION OF FACTS

Defendant and the Government, and their respective counsel, hereby agree and stipulate as follows:

1. From in or about 1998 through in or about August, 2002, Lowell Thomas Lakin, Defendant herein, knowingly used and maintained a place – namely, his residence, located at 287 Oakley Place, East Alton, Illinois (hereinafter, “the Oakley residence”) – for the purpose of distributing and using a controlled substance – namely, a mixture and substance containing cocaine, a Schedule II Controlled Substance (hereinafter, “cocaine”).

2. The Oakley residence was and is located in Madison County, within the Southern District of Illinois.

3. From in or about 1998 through in or about August, 2002, Defendant maintained the Oakley residence by causing others to perform maintenance services such as cleaning and home repair, and by paying for such services. Defendant further maintained the Oakley residence by

paying tax bills and monthly telephone bills and utility bills for the Oakley residence.

4. From in or about 1998 through in or about August, 2002, Defendant purchased and obtained cocaine, which Defendant then brought into the Oakley residence, where Defendant knowingly and intentionally used and distributed said cocaine to others, including persons under 21 years of age. Defendant would also telephone others and order cocaine for delivery to the Oakley residence, where Defendant knowingly and intentionally used and distributed said cocaine to others, including persons under 21 years of age.

5. From in or about 1998 through in or about August, 2002, the Oakley residence was a place where individuals would and did bring cocaine to use and share.

6. The amount of cocaine distributed by Defendant at the Oakley residence from in or about 1998 through in or about August, 2002, was more than 500 grams but less than 2 kilograms of cocaine.

7. On or about October 8, 2005, at the Oakley residence, Defendant knowingly and intentionally possessed with intent to distribute approximately 1/8 ounce of cocaine.

8. On or about October 8, 2005, at the Oakley residence, Defendant knowingly and intentionally distributed cocaine to others, including Jane Doe 4, who at the time was under twenty-one years of age, by placing said cocaine on a plate and dividing it into lines, which were then consumed by Defendant and others, including Jane Doe 4, in Defendant's presence, with

Defendant's knowledge and consent. At the time of said distribution, Defendant was approximately 65 years old and was therefore older than 18 years of age.



LOWELL THOMAS LAKIN
Defendant



N. SCOTT ROSENBLUM
Attorney for Defendant

Date: February 24th, 2008

A. COURTNEY COX
United States Attorney



STEPHEN B. CLARK
Assistant United States Attorney



KEVIN BURKE
Assistant United States Attorney

Date: 2/24/08